

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

---

MAUREEN HARRINGTON )  
Plaintiff/Counterclaim Defendant )  
 )  
v. )  
 )  
BLUE SKY CAPITAL, LLC )  
Defendant/Counterclaim Plaintiff. )

---

Case No. 1:22-cv-00534-KG-LF

**STPULATION DISMISSING DEFENDANT'S COUNTERCLAIMS AND  
WITHDRAWING AFFIRMATIVE DEFENSES**

Plaintiff and Defendant, by their undersigned counsel, acting pursuant to Rule 41(a)(1)(A)(ii), F.R.C.P., stipulate to Defendant Blue Sky Capital, LLC's dismissal, with prejudice, of its counterclaims in this matter for declaratory judgment, violation of the New Mexico Unfair Practices Act and *prima facie* tort; and to the withdrawal of its third, fourth, fifth and sixth affirmative defenses for unclean hands, willful misconduct, implied license, and waiver and estoppel, respectively.

Respectfully submitted,  
By: /s/ Jeffrey L. Squires  
Jeffrey L. Squires  
SQUIRES LEGAL COUNSEL, LLC  
(NM Bar No. 143015)  
P.O. Box 92845  
Albuquerque, NM 87199  
Telephone: (505) 835-5500  
Email: [jsquires@squireslegal.com](mailto:jsquires@squireslegal.com)

and

By: /s/ Daniel DeSouza  
Daniel DeSouza  
COPYCAT LEGAL, PLLC  
3111 N. University Drive  
Suite 301  
Coral Springs, FL 33065  
Telephone: (877) 437-6228

Email: [daniel@copycatlegal.com](mailto:daniel@copycatlegal.com)